## Leon E. Comeaux & Associates

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August 22, 2003

Honorable James H. Welsh Commissioner of Conservation Department of Natural Resources Office of Conservation P. O, Box 94275 Baton Rouge, Louisiana 70804-9275

RE: Substitute Unit Well Exceptional Location

Duhon 3 Sand, Reservoir H

**ABBEVILLE FIELD** 

Vermilion Parish, Louisiana

Dear Sir:

Application is hereby made on behalf of Republic Resources, L.L.C. for the calling of a public hearing, after ten (10) days legal notice, to consider evidence relative to the issuance of an order pertaining to the following matters relating to the Duhon 3 Sand, Reservoir H, in the Abbeville Field, Vermilion Parish, Louisiana, for which rules and regulations were established and a drilling and production unit was created for the exploration for and production of oil and gas by Office of Conservation Order No. 155-A-18, effective May 20, 2003, for the unit designated DUHON 3 RH SUA.

- To permit the applicant to drill, designate and utilize the Republic Resources, L.L.C. - Carl C. Durke No. 1 Sidetrack Well as a substitute unit well for the DUHON 3 RH SUA, said well to be at the bottom hole location shown on the plat attached hereto and made a part hereof, in exception to the spacing provisions of Office of Conservation Order No. 155-A-18 and Statewide Order No. 29-E.
- 2. To find that this well is necessary to efficiently and economically drain a portion of the reservoir covered by the unit which cannot be drained by any existing well within such unit.
- 3. Except to the extent herein designated, to continue in full force and effect the provisions of Office of Conservation Order No. 155-A-18, the unit created thereby and applicable Statewide Orders.
- 4. To consider such other matters as may be pertinent.

The Duhon 3 Sand, in the Abbeville Field, Vermilion Parish, Louisiana, was previously defined in Office of Conservation Order No. 115-A-15, effective September 17, 1991.

The existing unit well for the DUHON 3 RH SUA: Craig No. 1 Well is non-productive. Therefore, the applicant is requesting permission to drill, designate and utilize the Republic Resources, L.L.C. - Carl J. Durke No. 1 (Sidetrack) Well as a substitute unit well for the DUHON 3 RH SUA. This well will permit efficient and economic recovery of hydrocarbons underlying the unit.

Attached hereto and made a part hereof is a plat outlining the applicant's proposal and a list of the names and addresses of the Interested Owners, Interested Parties and Represented Parties to whom this application is being sent. Pursuant to the Revised Rules of Procedure, such list of parties is being furnished only to the Commissioner of Conservation and to the District Manager of the Lafayette District of the Office of Conservation. However, the list of parties will be provided to any party requesting a copy. A diligent effort was made to ascertain the names and addresses of all Interested Owners, Interested Parties and Represented Parties as required by the Revised Rules of Procedure.

Finally there is enclosed our check on behalf of the applicant, Republic Resources, L.L.C., in the sum of \$755.00 payable to the Office of Conservation and representing the required hearing application fee.

Sincerely,

**LEON E. COMEAUX & ASSOCIATES** 

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Leon E. Comeaux

LEC/cu Enclosures

cc: Mr. Richard Hudson

Office of Conservation 825 Kaliste Saloom Road Brandywine III, Suite 220

Lafayette, Louisiana 70508-4284

Interested Parties, Interested
Owners and Represented Parties

